

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>SECURITIES AND EXCHANGE COMMISSION,</b>	:
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<b>Plaintiff,</b>	:
	:
<b>– against –</b>	:
	:
<b>BARRY C. HONIG, ROBERT LADD,</b>	:
<b>ELLIOT MAZA, BRIAN KELLER,</b>	:
<b>JOHN H. FORD, GRQ CONSULTANTS, INC.</b>	:
<b>and HS CONTRARIAN INVESTMENTS, LLC,</b>	:
	:
<b>Defendants.</b>	:
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**DECLARATION OF KATHERINE S. BROMBERG IN SUPPORT OF  
PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT AGAINST  
DEFENDANT ROBERT LADD**

I, Katherine S. Bromberg, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am employed as a Senior Counsel in the Enforcement Division in the Boston Regional Office of the Plaintiff Securities and Exchange Commission (“Commission”). In that role I assisted in the investigation leading up to the filing of this action against Defendant Ladd, and have been participating in its litigation. I am familiar with the facts and circumstances herein. I am a member of the bar of this Court.

2. I submit this declaration in support of the Commission’s Motion for Partial Summary Judgment against Defendant Robert Ladd.

3. Appended hereto as Exhibit A is a true and correct copy of MGT’s Form 10-Q filed with the Commission on May 23, 2016.

4. Appended hereto as Exhibit B is a true and correct copy of Ladd’s January 14, 2013 TD Ameritrade account application.

5. Appended hereto as Exhibit C is a true and correct copy of a Ladd May 9, 2016 email exchange with TD Ameritrade.

6. Appended hereto as Exhibit D is a true and correct copy of a Ladd May 9, 2016 email exchange with TD Ameritrade.

7. Appended hereto as Exhibit E is a true and correct copy of Ladd's November 22, 2015 account application to E\*Trade.

8. Appended hereto as Exhibit F is a true and correct copy of relevant excerpts of Robert Ladd's October 15, 2020, October 16, 2020, November 10, 2020 and August 5, 2022 deposition transcripts.

9. Appended hereto as Exhibit G is a true and correct copy of a Ladd November 19, 2012 email exchange with Barclays employees.

10. Appended hereto as Exhibit H is a true and correct copy of a Ladd November 19, 2015 email exchange with a Barclays employee.

11. Appended hereto as Exhibit I is a true and correct copy of TD Ameritrade's internal records noting Ladd's verbal request to transfer 300,000 MGT shares and Ladd's dislike of TD Ameritrade's SEC 144 form handling.

12. Appended hereto as Exhibit J is a true and correct copy of the Form 8-K MGT filed with the Commission on May 9, 2016.

13. Appended hereto as Exhibit K is a true and correct copy of Ladd's Parents Account Opening Application to TD Ameritrade.

14. Appended hereto as Exhibit L is a true and correct copy of the June 19, 2015 Trading Authorization Agreement for Ladd to be an authorized agent for Ladd's Parents TD Ameritrade Account.

15. Appended hereto as Exhibit M is a true and correct copy of a May 11, 2016 email from Ladd to TD Ameritrade attaching Ladd's May 10, 2016 Form 144.

16. Appended hereto as Exhibit N is a true and correct copy of a May 13, 2016 \$325,000 check from Ladd's mother to Ladd.

17. Appended hereto as Exhibit O is a true and correct copy of a Ladd October 24, 2016 email exchange with Steve Ladd, his brother.

18. Appended hereto as Exhibit P is a true and correct copy of Ladd's handwritten notes attaching an April 4, 2017 Ladd email exchange with Steve Ladd and a check from Ladd to Ladd's father for \$18,042.

19. Appended hereto as Exhibit Q is a true and correct copy of a July 4, 2016 Ladd email exchange with McAfee explaining the structure of Laddcap.

20. Appended hereto as Exhibit R is a true and correct copy of Laddcap 2016 K-1s distributed to Laddcap members in 2017.

21. Appended hereto as Exhibit S is a true and correct copy of relevant excerpts of Joan Wu's June 22, 2022 deposition transcript.

22. Appended hereto as Exhibit T is a true and correct copy of Robert Hugh Holmes' May 31, 2016 Form 4.

23. Appended hereto as Exhibit U is a true and correct copy of Michael Onghai's May 31, 2016 Form 4.

24. Appended hereto as Exhibit V is a true and correct copy of a June 1, 2016 tweet from Michael Goode @goodetrades.

25. Appended hereto as Exhibit W is a true and correct copy of a May 31, 2016 tweet from DC @Mr\_guns6.

26. Appended hereto as Exhibit X is a true and correct copy of a May 31, 2016 tweet from LargeVoid Bot @LargeVoidBot.

27. Appended hereto as Exhibit Y is a true and correct copy of a June 9, 2017 email from an investor to Ladd.

28. Appended hereto as Exhibit Z is a true and correct copy of Ladd's May 24, 2016 Form 144.

29. Appended hereto as Exhibit AA is a true and correct copy of Ladd's May 25, 2016 Form 144 with a mailing label showing transmission to the SEC by TD Ameritrade.

30. Appended hereto as Exhibit BB is a true and correct copy of Ladd's May 7, 2016 email to the MGT Board.

31. Appended hereto as Exhibit CC is a true and correct copy of Ladd's May 8, 2016 email to Wu and Kaplowitz.

32. Appended hereto as Exhibit DD is a true and correct copy of Ladd's May 9, 2016 email to the D-Vasive team.

33. Appended hereto as Exhibit EE is a true and correct copy of Ladd's May 9, 2016 email to the MGT Board.

34. Appended hereto as Exhibit FF is a true and correct copy of Ladd's May 9, 2016 email to the printer, copying Kaplowitz and Wu.

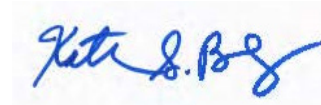
35. Appended hereto as Exhibit GG is a true and correct copy Kaplowitz's May 9, 2016 email to Ladd and others.

36. Appended hereto as Exhibit HH is a true and correct copy of relevant excerpts of Jay Kaplowitz's June 14, 2022 deposition transcript.

37. Appended hereto as Exhibit II is a true and correct copy of the May 9, 2016 *Stockbeast Report* article titled, “NYSE: MGT Beastmode engaged —John McAfee driving the Bus.”

I declare under penalty of perjury that the foregoing is true and correct.

Executed: January 31, 2023  
Needham, Massachusetts



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Katherine S. Bromberg